

ORIGINAL

**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268**

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POSTAL RATE
COMMISSION

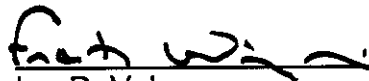
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Docket No. MC98-1

**PITNEY BOWES INTERROGATORIES
TO THE UNITED STATES POSTAL SERVICE
(PB/USPS-1-5)**

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, Pitney Bowes Inc. ("PB") hereby propounds the attached interrogatories and requests for the production of documents. The instructions for responding contained in the First Set of Interrogatories of Pitney Bowes Inc. to USPS Witness Plunkett are incorporated by reference.

Respectfully submitted,

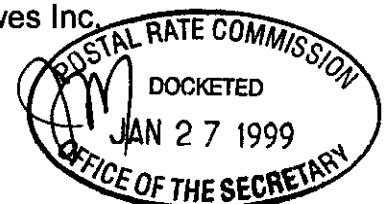


Ian D. Volner
N. Frank Wiggins
Venable, Baetjer, Howard & Civiletti, LLP
1201 New York Avenue, NW
Washington, DC 20005
(202) 962-4800

Aubrey M. Daniel III
Carolyn H. Williams
Williams & Connolly
725 12th Street, NW
Washington, DC 20005

Counsel to Pitney Bowes Inc.

DC1:87881



- PB/USPS-1 Table 1 of the MOL bi-weekly report for A/P2 Week 3 to A/P2 Week 4 shows two transactions which had, respectively, 501 to 1000 pieces and 1001 to 2500 pieces. Table 3 shows three batches processed during this period with a total of five pieces. Please reconcile this apparent inconsistency.
- PB/USPS-2 As noted, Table 3 shows three batches within the report period, but the Printer Site Logs at Appendix 1 lists five batches. Please reconcile this apparent inconsistency.
- PB/USPS-3 Is it a correct reading of Appendix 3.1 that the eight transactions reported on Table 1 generated nine separate telephone calls? If not, please describe the transactions to which any calls not relating to the six transactions did relate.
- PB/USPS-4 The three Forms 3600-R produced in conjunction with the bi-weekly data report for A/P2 Weeks 3 and 4 correspond in dates and volumes to the volumes per batch reported at Table 3, but not with the Printer Site Logs at Appendix 1. Please reconcile this apparent discrepancy.
- PB/USPS-5 The Forms 3600-R appear initially to have been printed charging Part C non-automation rates and subsequently corrected by hand to apply the basic automation rate. Is this an accurate reading of the forms and, if so, please explain why the non-automation rate was initially applied and by whom. If the reading is not accurate, please provide an accurate explanation for the apparent alteration of the forms.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served this document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

DATE: January 27, 1998

Ian D. Volner
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